

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES & EXCHANGE COMMISSION,

Plaintiff,

v.

RIPPLE LABS INC.,  
BRADLEY GARLINGHOUSE,  
and CHRISTIAN A. LARSEN,

Defendants.

No. 20-cv-10832 (AT)

**NOTICE OF MOTION TO OBTAIN INTERNATIONAL DISCOVERY**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and all prior proceedings in this case, Defendant Bradley Garlinghouse will move this Court to issue under its seal and signature the attached Letter of Request (Exhibit 2 to the enclosed Memorandum of Law) on behalf of Mr. Garlinghouse to obtain documents from the following foreign third parties:

Binance Holdings Limited  
Govnrs Square Ste 5-204 23 Lime Tree Bay Ave.,  
P.O. Box 2547  
George Town, Grand Cayman, KY1-1104

For the reasons set forth in the attached supporting Memorandum of Law, Mr. Garlinghouse respectfully requests that the Court issue the attached Letter of Request for International Assistance pursuant to 28 U.S.C. § 1781(b)(2) compelling the above-listed entity to produce documents so that the Mr. Garlinghouse can receive evidence before the close of fact discovery.

We understand that the Plaintiff the Securities and Exchange Commission does not object to this motion.

Dated: August 2, 2021

Respectfully submitted,

CLEARY GOTTlieb STEEN & HAMILTON LLP

/s/ Matthew C. Solomon

Matthew C. Solomon  
Nowell D. Bamberger  
Nicole Tatz  
2112 Pennsylvania Avenue, N.W.  
Washington, DC 20037  
202-974-1500

Alexander Janghorbani  
Samuel Levander  
Lucas Hakkenberg  
One Liberty Plaza  
New York, NY 10006 212-225-2000

*Attorneys for Bradley Garlinghouse*